

**Greenville Psychiatry, P.A.**

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**AFFIDAVIT**

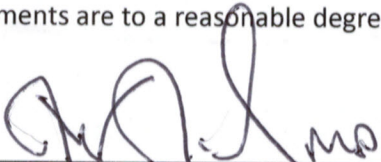
Charles Christopher Williams  
VS

Bryan P. Stirling, Director  
South Carolina Department of Corrections  
and Joseph McFadden, Warden  
Leiber Correctional Institute

I Robert Wadsworth Richards, M.D. being duly sworn to say:

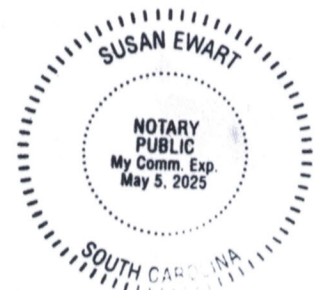
1. Part of the data base upon which this Affidavit is based includes the August 25, 2004 memo written by Jan Vogelsang to John Maudlin, the January 20, 2012 Bookstein, PhD Morphometric Evaluation of Charles Christopher Williams' brain MRI and the January 24, 2004 Quantitative EEG Analysis Report written by Thatcher, PhD with Applied Neuroscience, Inc.
2. According to the Vogelsang August 25, 2004 memo I recommended that Charles Christopher Williams' evaluation include an MRI of his brain.
3. The Bookstein, PhD evaluation includes a morphometric analysis of a Corpus Callosum Malformation identified on Mr. Williams' Brain MRI.
4. Had I known that Mr. Williams had a Corpus Callosum Malformation I would more likely than not have requested a Genetics Consultation. I would have asked the Geneticist for an opinion about the likely cause of the malformation and if the likely case could be associated with other brain abnormalities which should be investigated.
5. Had I known that Mr. Williams had a Corpus Callosum Malformation I would more likely than not have requested a consultation from a Neuropsychologist with expertise in brain function abnormalities associated with a Corpus Callosum Malformation. I would have asked the Neuropsychologist for a quantitative assessment of brain function abnormalities which might be associated with the Corpus Callosum Malformation.
6. These opinions and statements are to a reasonable degree of medical certainty.

DATED February 6, 2017

  
Robert W. Richards, M.D.

SWORN to subscribed before me

2/6/17  
Date



*Susan Ewart 0206-2017*